

EXHIBIT 4

1 - TARIQ SHAUKAT -

2
3 IN THE UNITED STATES DISTRICT COURT
4 FOR THE SOUTHERN DISTRICT OF NEW YORK
5 ----- X
6 ULKU ROWE,

7 Plaintiff,

8 Case No.
9 19 Civ. 08655 (LGS) (GWG)

10 v.

11 GOOGLE LLC

12 Defendant.
13 ----- X

14 DATE: October 15, 2020

15 TIME: 9:34 a.m.

16 VIDEOTAPED VIDEOCONFERENCE DEPOSITION
17 OF TARIQ SHAUKAT, held via Zoom, pursuant to
18 Notice, before Hope Menaker, a Shorthand Reporter
19 and Notary Public of the State of New York.
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1 - TARIQ SHAUKAT -

2 focused on?

3 A. He was focused on the -- the title of
4 the vertical changed from time to time, but it was
5 broadly manufacturing and industrials.

6 Q. And at the time he joined your group,
7 was there a VP of manufacturing and industrials?

8 A. No, there was not.

9 Q. And Evren, do you know what vertical
10 he was focused on?

11 A. He was healthcare and life sciences.

12 Q. Was there a VP of healthcare and life
13 sciences?

14 A. There was, yes.

15 Q. Who was that?

16 A. His name is Greg Moore, M-O-O-R-E.

17 Q. And what level was he?

18 A. He was a VP, so level 10 VP.

19 Q. Okay. Were you involved in the
20 hiring of Stuart Breslow?

21 A. I was, yes.

22 Q. Okay, we're gonna go back to the Box.

23 A. Okay.

24 Q. And -- and I apologize if you already
25 clarified this, but Ben's vertical, was that

1 - TARIQ SHAUKAT -

2 Q. And what about Mr. Breslow's
3 background made him an ideal candidate for
4 that -- for that role?

5 A. Stuart had been a longtime chief
6 compliance officer to highly-respected
7 financial institutions in the field of compliance
8 specifically, so Morgan Stanley and then Credit
9 Suisse.

10 Before that he also had been a
11 partner, subsequent to those experiences, at
12 McKinsey focusing specifically on topics such as
13 anti-money laundering, which was a very
14 high-interest area for us from a product
15 standpoint as well and so he -- and so he had both
16 the -- and he had published a paper, I recall is
17 the way we found him, on anti-money laundering
18 that was quite influential on how we were thinking
19 about the anti-money laundering space.

20 Q. Didn't he actually come to be known
21 to Google through Ruth Porat?

22 A. He did not, no. At least, not to my
23 knowledge. I -- I -- Ruth was not the person who
24 identified him to me.

25 Q. And so you're not aware that he was